STAFF REPORT

Rule 3.14: *Surface Preparation and Clean-Up*

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Rule 3.19: *Motor Vehicle and Mobile Equipment Coating Operations*

Date of Adoption: August 1, 2016

Schedule of Meetings
Rule Changes Workshop: July 12, 2016
Public Hearing: August 1, 2016

Feather River AQMD
541 Washington Avenue,
Yuba City, California 95991

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1.0 Executive Summary:

Feather River Air Quality Management District (District) is a Bi-County agency that administers local, state, and federal air quality management programs for Yuba and Sutter Counties.

Because portions of the District have been designated as nonattainment for failure to meet the federal 8-hour ground-level ozone standard, the United States Environmental Protection Agency (US EPA) requires the District to implement measures to reduce ozone precursors. The District has committed to implement control measures and reduce pollution through the State Implementation Plan (SIP). The SIP is federally enforceable through the US EPA and the Federal Clean Air Act (CAA).

Under the provisions of the California Clean Air Act (CCAA) of 1988, Yuba County and the northern portion of Sutter County have been designated as "nonattainment-transitional" for failing to meet the state ozone standard. The southern portion of Sutter County is designated as "severe" nonattainment for failing to meet the state ozone standard. The District must adopt all feasible measures to attain the state ozone standard as expeditiously as practicable.

Reducing VOC emissions is part of the District's strategy for reducing ozone formation as VOC reductions are necessary to attain and maintain the federal and state ambient air quality standard for ozone. VOC's are precursor emissions that create ozone in the presence of other pollutants and a catalyst. The District adopted Rule 3.14 Surface Preparation and Clean-Up in 1991 and Rule 3.19 Vehicle and Mobile Coating Operations in 1998 to reduce VOC's from solvents and coatings.

The intent of the proposed amendments to Rule 3.14 is to further reduce VOC emissions from solvents used in surface preparation, clean up and cleaning of application equipment. The intent of the proposed amendments to Rule 3.19 is to further reduce VOC emissions from coatings used in the painting of motor vehicles, mobile equipment and associated parts and components. The District is revising the rules to incorporate the California Air Resources Board (CARB) Suggested Control Measure (SCM) for Automotive Coatings and Components[1]. The SCM recommended lowering the VOC limit to 25 grams per liter for solvents used in surface preparation, cleanup and cleaning of application equipment; which causes a need to amend Rule 3.14. The SCM also consolidated coatings for Group I and Group II vehicles, replaced the specialty coating and multi-stage coating categories with specific coating categories, and established lower VOC limit for coating categories and solvents. The District staff is also proposing to incorporate other minor changes resulting in improvement to clarity, effectiveness, and consistency with other agencies.

[1] http://www.arb.ca.gov/coatings/autorefin/scm/scm.htm October 20, 2005, CARB adopted the SCM for Automotive Coatings.

2.0 Background:

Surface Preparation and Clean-Up and Motor Vehicle and Mobile Equipment Coating Operations

Automotive coatings, as defined in the SCM, are coatings that are applied to motor vehicles and mobile equipment. Automotive coatings are sold as components that must be mixed to be applied. The main coating categories include primers, color coatings, and clear coatings. These three broad categories of coatings account for about 84 percent of the sales reported in 2001. The remaining sales consist of a variety of coatings such as pretreatment coatings or adhesion promoters intended for use on bare metal or plastics. Automotive coatings, as defined in the SCM, do not include aerosol coatings (e.g., spray paint) or original equipment manufacturer coatings. Solvents, as defined in the SCM are VOC-containing fluids used to perform cleaning operations. The SCM recommends lowering the VOC limits of solvents used in surface preparation, clean-up and cleaning of application equipment to 25 grams per liter. VOC solvents will need to be reduced by increasing the amount of water, exempt solvents, or coating solids. In solvent-borne products, VOC solvents may be partially replaced with exempt solvents such as acetone, parachlorobenzotrifluoride or tertiary butyl acetate.

Control of emissions from solvents and automotive coatings is primarily the responsibility of the local air pollution control and air quality management districts (districts). However, the Air Resources Board (ARB) provides technical support to districts through the development of SCMs and other similar efforts. ARB staff, in cooperation with the districts, has developed the proposed SCM for automotive coatings. The SCM will serve as a model for districts when adopting and amending their automotive coatings rules. The proposed SCM, in part, relies upon the efforts of the Enforcement Managers Committee of the California Air Pollution Control Officers' Association. The proposed SCM reflects nearly four years of study of automotive coatings, and was developed in cooperation with the districts, the United States Environmental Protection Agency (U.S. EPA), and the affected industry.

Emissions from Solvents and Coatings

The annual average volatile organic compound (VOC) emissions from automotive coatings are estimated to be about 20.7 tons per day in California in 2001 or about two percent of the total stationary source VOC emissions statewide. When automotive coatings are applied; the solvents that hold the coatings in suspension evaporate into the atmosphere and contribute to VOC emissions.

VOC emissions are precursors to the formation of ozone and particulate matter (PM), California's most serious air quality problems. VOCs react photo-chemically with oxides of nitrogen (NOx) to form ozone. Ozone is a strong oxidizer that irritates the human respiratory system, increases airway hyper-reactivity, increases airway inflammation, and damages plant life and property. Exposure to ozone is also associated with premature death, hospitalization for cardiopulmonary causes, asthma episodes and restrictions in physical activity. VOCs also react in the atmosphere to form PM which consists of very small liquid and solid particles suspended in the air. PM includes particles smaller than 10 microns in size (PM10), as well as the subset of fine particles

smaller than 2.5 microns in size (PM2.5). PM10 and PM2.5 are inhaled deeply into the lungs and reduce human pulmonary function. Premature deaths linked to PM10 and PM2.5 exposure are now at levels comparable to deaths from motor vehicles and second hand smoke. PM10 and PM2.5 may also contain toxic compounds. In the atmosphere, PM10 and PM2.5 reduce visibility.

FRAQMD Rule 3.19

District Rule 3.19, Vehicle and Mobile Equipment Coating Operations was adopted in August of 1998 and amended in August of 2011. The amendment in August 2011 did not adopt CARB's SCM for this category. The purpose of this rule is to limit the emission of volatile organic compounds into the atmosphere from coatings associated with the coating of motor vehicles, mobile equipment and associated parts and components. This rule applies to anyone who sells, supplies, distributes or uses, applies or solicits the use or application of any automotive coating within the District. Not only do the coatings have to be compliant with the District limits, but recordkeeping and application requirements have to be satisfied as well.

FRAQMD Rule 3.14

District Rule 3.14, Surface Preparation and Clean-Up was adopted in June of 1991 and amended in August of 2011. The purpose of this rule is to limit the emission of volatile organic compounds into the atmosphere from solvents used in surface preparation, clean-up and cleaning of application equipment. This rule applies to any owner or operator of any facility that uses VOC containing materials for surface preparation and clean-up, or any person who sells or distributes any solvent within the District. Not only do the solvents have to be compliant with the District limits, but recordkeeping and application requirements have to be satisfied as well.

CARB's SCM

On October 20, 2005, CARB adopted a SCM for Automotive Coatings that combined coating categories and established lower VOC limits. The purpose of the SCM is to promote uniformity among California district rules. The SCM also improved the enforceability of District rules by simplifying coating categories and establishing individual VOC limits for color coatings and clear coatings. To date, twelve other California air districts have amended their rules to be consistent with the SCM.

The SCM applies to anyone who sells, supplies, offers for sale, or manufactures any automotive coating, as well any person who applies or solicits the application of any automotive coating in the applicable District.

The structure of the proposed SCM differs significantly from existing district rules. Currently, the district rules and the U.S. EPA automotive coatings rule allow for a composite VOC limit for "multi-stage topcoat" systems. The SCM replaces the composite VOC limit with specific VOC limits for clear and color coatings.

The SCM only listed two toxic air contaminants that shall not be contained in automotive coatings, cadmium and hexavalent chromium. The SCM suggests no person shall apply a coating to any motor vehicle, mobile equipment, or associated parts and components

that contain cadmium and hexavalent chromium. Only these two toxics are listed due to the findings at the time of the SCM that suggested these two toxics were the biggest concern in coatings. ARB staff said they looked at other toxics and contaminants such as lead and nickel, but came to the conclusion they were not of concern, hence focused on cadmium and hexavalent chromium.

The SCM also includes a 25 gram per liter VOC limit for surface preparation and cleanup consistent with the most stringent limit for this category established by the SCAQMD.

The SCM:

- Combines the Group I and Group II vehicle categories, and establishes the same VOC limits for passenger vehicles, heavy-duty vehicles, and mobile equipment. This would improve enforcement and simplify recordkeeping;
- Eliminates the composite VOC limit for multi-stage systems, and replaces it with specific VOC limits for clear coatings and color coatings. This would improve enforcement;
- Simplifies and combines district coating categories reducing the total number of categories from thirty-four to twelve. See Table IV-3 in Chapter IV for a list of coating categories typically found in district rules and the corresponding category in the proposed SCM;
- Eliminates the specialty coatings category and replaces it with two specific category limits. The survey data indicate that several coating types qualifying for a high VOC limit under the districts' specialty coatings category were not sold in California in 2001;
- Establishes a prohibition of possession provision, which would prohibit any person from having, at any automotive refinishing facility, coatings or solvents that do not comply with the proposed VOC limits. Only one district rule currently has a prohibition of possession. This would improve enforcement;
- Establishes a 25 grams per liter VOC limit for solvents used in cleaning operations, including surface preparation and spray gun cleaning. This limit is consistent with the most stringent district VOC limit for solvents which is in the South Coast Air Quality Management District (SCAQMD);
- Improves recordkeeping and labeling. The SCM sets consistent recordkeeping requirements for the coating end user. The SCM also establishes labeling requirements for coating manufacturers which would improve enforcement; and
- Exempts tertiary butyl acetate from the VOC definition to provide compliance flexibility.

Table 1 shows coating categories found in the existing District Rule and their corresponding category in the proposed SCM:

Table 1 – Comparison of Coating Categories

Existing District Categories	SCM Categories
Camouflage	Color Coating

Extreme Performance	Primer, Color Coating, Clear Coating, Single-Stage Coating, or Underbody Coating
General Topcoat	Single-Stage Coating
Multi-Color Multi-stage	Multi-Color Coating
Multi-stage Topcoat (aka Multi-stage Topcoat System)	Color Coating & Clear Coating
Precoat	Primer
Pretreatment Wash Primer (aka Pretreatment or Pretreatment Coating)	Pretreatment Coating
Primer	Primer
Primer Sealer	Primer
Primer Surfacer	Primer
Single-Stage Nonmetallic/Noniridescent Topcoat	Single-Stage Coating
Single-Stage Metallic/Iridescent Coating	Single-Stage Coating
Solid Color Topcoat	Single-Stage Coating
Topcoat (aka All Other Topcoats)	Single-Stage Coating
Specialty Coatings	The generic category has been eliminated and replaced with specific categories for the various coatings previously grouped together

The SCM was developed in cooperation with the 20 air districts that have adopted rules limiting the emissions from automotive coatings, the U.S. EPA, the automotive coatings manufacturers, the collision repair industry, and other interested parties. The SCM development process included the following activities: (1) a comprehensive survey of automotive coatings manufacturers; (2) technical analyses of all the coating categories proposed in the SCM; (3) meetings with districts and U.S. EPA Region IX, and industry representatives; (4) an evaluation of potential environmental impacts; and (5) an analysis of the cost impacts. ARB staff also conducted six public workshops and several meetings and conference calls with individual manufacturers and other interested parties.

3.0 Legal Mandates:

The EPA and ARB have adopted ambient air quality standards to determine outdoor pollutant levels considered safe for the public. The standards are health-based and designed to provide protection for the most sensitive groups. Areas that do not meet the standards are required to adopt control measures to limit emissions of certain pollutants.

Federal Mandate
The Clean Air Act (CAA) requires air districts not attaining the ozone standards to prepare a plan describing how the National Ambient Air Quality Standard (NAAQS) will be met[2]. The southern portion of Sutter County is part of the Sacramento Federal Nonattainment Area (SFNA) for ozone. The SFNA was designated as severe nonattainment for the 1997 8-hour Ozone NAAQS and the 2008 8-hour Ozone NAAQS. The District committed as part of the 2009 Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan[3] (2009 Ozone Plan) to reduce VOC from automotive coatings.

State Mandate
The California Clean Air Act (CCAA) requires areas designated as nonattainment for ozone to develop a plan to achieve California's ambient air quality standard by the earliest practical date by adopting cost-effective control measures[4]. The SFNA portion of Sutter County is designated as "severe" nonattainment for the state ozone standard. CH&S Code §40920 requires the District to adopt a control measure that will use Best Available Retrofit Control Technology (BARCT) for all existing stationary sources in this area. BARCT, as defined in the CH&S, is as "an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy and economical impacts by each class or category of source."

Yuba County and the northern area of Sutter County are designated as "nonattainment-transitional" for the state ozone standard. CH&S Code §40925.5 requires the District to adopt a control measure that will use RACT for all existing stationary sources in these areas.

California Health and Safety Code section 40914 requires the District's plan to demonstrate that it includes "every feasible measure" to control emissions. All feasible control measures are those which have the most effective regulatory emissions standards demonstrated in California's air districts. The District's 2015 Triennial Air Quality Attainment Plan[5] was adopted by the Board of Directors on December 7, 2015. This Plan includes the District's commitments for adopting feasible control measures. The District committed to adopting the SCM in 2016.

4.0 Proposed Rule Requirements:

The District is proposing amendments to Rule 3.14 and Rule 3.19 that will reduce emission of VOC's.

Rule 3.19:

- Combines the Group I and Group II vehicle categories
- Adds seven new coating categories

[2] http://www.arb.ca.gov/fcaa/fcaa.htm
[3] http://airquality.org/plans/federal/ozone/8hr1997/index.shtml
[4] California Health and Safety Code section 40913
[5] http://www.fraqmd.org/AQPlans.html

- Eliminates multi-stage coating category
- Lowers the VOC limit for the coatings
- Adds Prohibition of Possession and Prohibition of Sale or Manufacture.
- Modifies the alternative compliance option (Emission Control System)
- Modifies recordkeeping and monitoring requirements

Rule 3.14

- Lower the VOC limit to 25 grams per liter for solvents used in surface preparation and cleanup
- Removes the 20 gallons or less use per calendar year exemption
- Adds Prohibition of Possession and Prohibition of Sale or Manufacture
- Adds active and passive solvent losses

The proposed amendment retains the coating application requirements in the existing rule, the requirements for paint booths, the residential/personal use exemption, aerosol products coating exemption, and coatings shipped outside the District exemption.

The District has also included a sell through and use through provision. After December 31, 2016 no person shall manufacture, blend, repackage for sale, supply, sell, offer for sale or distribute any coating or solvent that is excess of the new proposed limits. After December 31, 2017 no person shall possess at any automotive refinishing facility, any VOC-containing product that is not in compliance with the new proposed limits.

The comparison of VOC categories and limits between the current Rule 3.19 and the new proposed rule can be seen in Table 2 and Table 3:

Table 2 - Current Categories and VOC Limits:

Coating Category	Effective July 1, 1999	
	Group I Vehicles & Color Match for Group II Vehicles g/l (lb/gal)	Group II Vehicles & no Color Match g/l (lb/gal)
Pretreatment Wash Primer	780 (6.5)	780 (6.5)
Primer/Primer Surfacer	340 (2.8)	340 (2.8)
Primer Sealer	420 (3.5)	340 (2.8)
Single-Stage/Multi-Stage Topcoats	600 (5.0)	420 (3.5)
Specialty Coating	840 (7.0)	840 (7.0)
Extreme Performance	--------	750 (6.2)
Camouflage	--------	420 (3.5)

Table 3 - Proposed Categories and VOC Limits:

Coating Category	Regulatory VOC Content g/l (lb/gal)
Adhesion Promoter	540 (4.5)
Clear Coating	250 (2.1)
Color Coating	420 (3.5)
Multi-Color Coating	680 (5.7)
Pretreatment Coating	660 (5.5)
Primer	250 (2.1)
Primer Sealer	250 (2.1)
Single-Stage Coating	340 (2.8)
Temporary Protective Coating	60 (0.5)
Truck Bed Liner Coating	310 (2.6)
Underbody Coating	430 (3.6)
Uniform Finish Coating	540 (4.5)
Any Other Coating Type	250 (2.1)

The comparison of VOC limits between the current Rule 3.14 and the new proposed rule can be seen in Table 4 and Table 5:

Table 4 – Current VOC Limits:

Category			VOC Content Limit (grams/Liter)	
			Prior to 12/31/2011	Effective 12/31/2011
Product Cleaning	Coatings and Adhesives			50
	Vehicles & Mobile Eqmt. [Rule 3.19]	Surface Prep	200	50
		Handheld Spray	780	50
	Wood Products [Rule 3.20]		200	50
	Metal Parts and Products			50
	Polyester Resins			50
	Inks			50
	Electrical Apparatus Components & Electronic Components			100
	Aerospace Components			900
	Medical Devices, Pharmaceuticals, and Pharmaceutical Products			800
Cleaning of Application Equipment	Coatings and Adhesives			50
	Vehicles & Mobile Eqmt. [Rule 3.19]			50
	Wood Products [Rule 3.20]			50
	Metal Parts and Products			50
	Polyester Resins			50

	Printing Operations: Screen, Lithographic, and Letterpress, Ultraviolet, Flexographic, Gravure (Publication)		100
	Aerospace Components		50
	Medical Devices, Pharmaceuticals, and Pharmaceutical Products		800
Sterilization of food manufacturing and processing equipment			200
General: Industries Not Specified Above			50

Table 5 – Proposed VOC Limits:

Category			VOC Content Limit (grams/Liter)
Product Cleaning	Coatings and Adhesives		25
	Vehicles & Mobile Eqmt. [Rule 3.19]	Surface Prep	25
		Handheld Spray	25
	Wood Products [Rule 3.20]		25
	Metal Parts and Products		25
	Polyester Resins		25
	Inks		25
	Electrical Apparatus Components & Electronic Components		100
	Aerospace Components		900
	Medical Devices, Pharmaceuticals, and Pharmaceutical Products		800
Cleaning of Application Equipment	Coatings and Adhesives		25
	Vehicles & Mobile Eqmt. [Rule 3.19]		25
	Wood Products [Rule 3.20]		25
	Metal Parts and Products		25
	Polyester Resins		25
	Printing Operations: Screen, Lithographic, and Letterpress, Ultraviolet, Flexographic, Gravure (Publication)		100
	Aerospace Components		25
	Medical Devices, Pharmaceuticals, and Pharmaceutical Products		800
Sterilization of food manufacturing and processing equipment			200
General: Industries Not Specified Above			25

The SCM includes provision to exempt tertiary butyl acetate (t-butyl acetate) from the VOC definition for automotive refinishing to provide compliance flexibility. The District in Rule 1.1, General Provisions and Definitions, already has tertiary butyl acetate as an

exempt compound. The definitions established in Rule 1.1 pertain to all the rules therefore the District does not need to include any provisions to exempt t-butyl from the definition of VOC in Rue 3.19.

5.0 Socioeconomic Impact:

California Health and Safety Code §40728.5 requires, in part, that:

> "Whenever a district intends to propose the adoption, amendment or repeal of a rule or regulation that will significantly affect air quality or emissions limitations, that agency shall, to the extent that data are available, perform an assessment of the socioeconomic impacts of the adoption, amendment, or repeal of the rule or regulation."

However, districts with a population of less than 500,000 persons are exempt from the provisions of CH&S §40728.5 (a). The District's population is estimated to be approximately 170,000, which is well below the 500,000 person threshold. Therefore, a socioeconomic analysis for this rulemaking is not required.

6.0 Emission Impacts of the Proposed Rule:

In 2002 CARB conducted a survey of automotive coatings products used in California. CARB used this data to estimate VOC emissions from the use of products. Emissions from automotive coatings, excluding emissions from solvents used for surface preparation and cleanup, were estimated to be 7,631 tons per year or 20.7 tons per day in California. Emission reduction from statewide implementation was estimated to be about 13.4 tons per day, equating to a 63 percent reduction in total VOC emissions from the coating categories. Correcting the emissions based on District population yields an emission reduction of 22 tons per year or .06 tons per day**.**

Coating Category	**Emission Reduction (tpd)**
Adhesion promoter	0.02
Clear coating	1.61
Color coating	8.78
Multi-color coating	N/A
Pretreatment coating	0.21
Primer	1.01
Single-stage coating	1.68

Temporary protective coating	<0.01
Truck bed liner coating	<.01
Underbody coating	<.01
Uniform finish coating	.05
Any other coating type	N/A
Total	**13.4**

Because the ARB SCM 2002 Survey did not collect data on solvent usage for surface preparation and cleanup, we are unable to quantify the emission reduction from the 25 g/l VOC limit for solvents. However, the emission reduction from the 25 g/l VOC limit has already been accounted for in the SCAQMD under Rule 1171. Although not quantified, extending the 25 g/l VOC limit for solvents statewide would achieve emission reductions outside of the SCAQMD.

7.0 Estimated Cost Impact:

CH&SC §40703 requires the District, in the process of the adoption of any rule or regulation, to consider and make public its findings related to the cost effectiveness of the rule. Cost effectiveness for rulemaking purposes is calculated by dividing the cost of air pollution controls required by the rule by the amount of air pollution reduced.

The 2005 CARB staff report analyzed the economic impacts of adopting the SCM. The analysis examined the impact to manufacturers of automotive coatings and to automotive refinishing facilities. The analysis did not include potential costs from complying with limits for solvents. CARB estimated over-all cost-effectiveness of adopting the proposed to be $1.43 per pound of VOC reduced. The average annual cost for automotive refinishing facilities is estimated to be about $3,400.

8.0 Environmental Review and Compliance:

The amendments to Rules 3.14 and 3.19 are categorically exempt from the California Environmental Quality Act (CEQA) under Sections 15307 and 15308 of the State CEQA Guidelines and no exceptions to these exemptions apply. This exemption is allowed when the rule will help improve air quality in Yuba and Sutter counties. California Public Resources Code (Section 21159) requires an environmental analysis of the reasonably foreseeable methods of compliance. The District has determined that the adoption of amendments to Rules 3.14 and 3.19 will not have significant effect on the environment or humans due to unusual circumstances. In addition, the proposed amendments to

Rules 3.14 3.19 are considered an action taken to protect the environment. Therefore, staff has determined that the project is categorically exempt from the requirements of the CEQA pursuant to Section 15308, Actions by Regulatory Agencies for Protection of the Environment.

In Chapter VI of the Staff Report for the SCM, ARB examined the potential effect of the proposed SCM on air quality, water demand, water quality, public services (public facility maintenance, fire protection), transportation and circulation, solid waste/hazardous waste, and hazards to the public or the environment. Based on the analysis significant adverse environmental impacts to result from the implementation of the proposed SCM are not expected.

9.0 Required Findings:

The California Health and Safety Code, Division 26, Air Resources, requires local Districts to comply with a rule adoption protocol as set forth in Section 40727 of the Code. This section has been revised through legislative mandate to contain 6 findings that the District must make when developing, amending, or repealing a rule. These findings and their definitions are listed in the following table.

FINDING	DEFINITION	REFERENCE
Authority	A district shall adopt rules and regulations and do such acts as may be necessary or proper to execute the powers and duties granted to, and imposed upon, the district by this division and other statutory provisions.	California Health and Safety Code, Sections 40000, 40001, and 40702 are provisions of law that provide air districts with the authority to adopt these proposed rules.
Necessity	The District has demonstrated that a need for the rule, or for rule amendment or repeal.	It is necessary for districts to adopt these amendments to comply with state law and to ensure consistency with neighboring air districts.
Clarity	The rule is written or displayed so that its meaning can easily be understood by the persons directly affected by it.	There is no indication, at this time, that the proposed rule is written in such a manner that it cannot be easily understood by persons affected by the rule.
Consistency	This rule is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or State or federal regulations.	The rule is consistent with applicable statutory requirements.
Non-Duplication	The rule does not impose the same requirements as an existing State or federal regulation, unless the District finds that the	The proposed rule does not impose requirements that duplicate existing laws or regulations.

	requirements are necessary and proper to execute the powers and duties granted to, and imposed upon, the district.	
Reference	Any statute, court decision, or other provision of law that the district implements, interprets, or makes specific by adopting, amending, or repealing a regulation.	The proposed rule is consistent with the provisions of the CAA and the CH&SC.

10.0 Rule Analysis

Section 40727.2 requires a written analysis comparing the proposed rules with existing federal regulations, state regulation, and any other AQMD existing or proposed rules and regulations that apply to the same source type.

Comparison of Proposed Rules 3.14 and 3.19 and Feather River AQMD Rules and Regulations

District Rules and Regulations	Does proposed rule conflict or contradict any provisions?
Regulation 1 – General Provisions	No
Regulation 2 – Open Burning	No
Regulation 3 – Prohibition – Stationary Emission Sources	No
Regulation 4 – Stationary Emission Sources Permit System and Registration	No
Regulation 5 – Hearing Board Procedures	No
Regulation 6 – Variances	No
Regulation 7 – Fees	No
Regulation 8 – Penalties and Abatement	No
Regulation 9 – Enforcement Procedures	No
Regulation 10 – New Source Review	No
Regulation 11 – Air Toxic Control Measure	No

Comparison of Proposed Rules and other Federal and State Regulations

There are no existing federal or state regulations regarding the use of automotive coatings or solvents that would be in conflict with or are contradictory to the proposed rule. The proposed rule is adopting the same definitions and VOC limits as the Suggested Control Measure adopted by the California Air Resources Board on October 20, 2005.

The U.S.EPA has adopted National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings[6]. The VOC limits proposed in FRAQMD Rule 3.19 are more restrictive than these.

Coating Category	Grams VOC per Liter	Proposed Rule 3.19 g/L
Pretreatment wash primers	780	660
Primers/primer surfacers	580	250
Primer sealers	550	250
Single/two-stage topcoats	600	340
Topcoats of more than two stages	630	680 (Multi-color coating)
Multi-colored topcoats	680	680
Specialty coatings	840	250

The U.S.EPA has also adopted Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings[7] that applies to components of mobile equipment. The proposed VOC limits and controls proposed in FRAQMD Rule 3.19 are equal or more restrictive than the CTG.

The U.S.EPA has also adopted a CTG for Industrial Cleaning Solvents[8]. The proposed VOC limits and controls proposed in FRAQMD Rule 3.14 are equal or more restrictive than the CTG. The CTG recommends a VOC content limit of 50 grams per liter, which is equal to the current limits in Rule 3.14 and less restrictive than the SCM and proposed amendments in Rule 3.14 of 25 grams per liter.

[6] National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings, 40 CFR part 59, September 11, 1998.
[7] CTG for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008
[8] CTG for Industrial Cleaning Solvents, EPA-HQ-OAR-2006-0535, September 2006

References

Staff Report for the Proposed Suggested Control Measure for Automotive Coatings, California Air Resources Board, October 2005

National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings, United States Environmental Protection Agency, September 1998

Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, United States Environmental Protection Agency, September 2008

Control Techniques Guidelines for Industrial Cleaning Solvents, United States Environmental Protection Agency, September 2006